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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF ARIZONA

11 IN RE BARD IVC FILTER PRODUCTS
12 LIABILITY LITIGATION,

13 Case No.2:15-MD-02641-DGC

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**AMENDED SECOND AMENDED
MASTER SHORT FORM COMPLAINT
FOR DAMAGES FOR INDIVIDUAL
CLAIMS AND DEMAND FOR JURY
TRIAL**

Plaintiff named below, for their Complaint against Defendants named below, incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364). Plaintiff further shows the Court as follows:

1. Plaintiff/Deceased Party:

Joy Denton

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
consortium claim:

NONE

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

NONE

1 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the
2 time of implant:

3 Iowa
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5 5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at
6 time of injury:

7 Iowa
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9 6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

10 Iowa
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12 7. District Court and Division in which venue would be proper absent direct filing:

13 United States District Court- Southern District of Iowa
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15 8. Defendants (check Defendants against whom Complaint is made):

16 [X] C.R. Bard Inc.
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18 [X] Bard Peripheral Vascular, Inc.
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20 9. Basis of Jurisdiction:

21 [X] Diversity of Citizenship
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23 o Other: _____
24 a. Other allegations of jurisdiction and venue not expressed in Master
25 Complaint:
26 _____
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28 _____

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a
claim (check applicable Inferior Vena Cava Filter(s)):

11 [] Recovery® Vena Cava Filter
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13 [X] G2® Vena Cava Filter
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15 [] G2® Express Vena Cava Filter
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17 [] G2® X Vena Cava Filter
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19 [] Eclipse® Vena Cava Filter
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21 [] Meridian® Vena Cava Filter
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1 [] Denali® Vena Cava Filter
2 [] Other:

3 11. Date of Implantation as to each product:

4 December 3, 2008

5 12. Counts in the Master Complaint brought by Plaintiff(s):

6 [X] Count I: Strict Products Liability-Manufacturing Defect
7 [X] Count II: Strict Products Liability- Information Defect (Failure to
8 Warn)
9 [X] Count III: Strict Products Liability- Design Defect
10 [X] Count IV: Negligence-Design
11 [X] Count V: Negligence- Manufacture
12 [X] Count VI: Negligence- Failure to Recall/Retrofit
13 [X] Count VII: Negligence- Failure to Warn
14 [X] Count VIII: Negligence Misrepresentation
15 [X] Count IX: Negligence *Per Se*
16 [X] Count X: Breach of Express Warranty
17 [X] Count XI: Breach of Implied Warranty
18 [X] Count XII: Fraudulent Misrepresentation
19 [X] Count XIII: Fraudulent Concealment
20 [X] Count XIV: Violations of Applicable South Carolina (insert
21 State) Law Prohibiting Consumer Fraud and Unfair and
22 Deceptive Trade Practices
23 [] Count XV: Loss of Consortium
24 [] Count XVI: Wrongful Death
25 [] Count XVII: Survival
26 [X] Punitive Damages
27 [] Other(s) _____ (please state the facts supporting this
28 Count in the space immediately below)

1 _____
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5 13. Jury Trial demanded for all issues so triable?
6 [X] Yes
7 [] No
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RESPECTFULLY SUBMITTED this 14th day of November, 2017.

NELSON BUMGARDNER, P.C

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I hereby certify that on this 14th day of November, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of the Notice of Electronic Filing.

/s/Timothy E. Grochocinski